IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE

TENNESSEE CLEAN WATER NETWORK and TENNESSEE SCENIC RIVERS)))
ASSOCIATION,) No. 3:15-cv-00424
)
Plaintiffs,) Judge Haynes
)
v.) Magistrate Judge Holmes
)
TENNESSEE VALLEY AUTHORITY,)
)
Defendant.)

DECLARATION OF ELIZABETH A. ALEXANDER

I, Elizabeth A. Alexander, being first duly sworn, do hereby state and affirm as follows:

- 1. I am over 18 years of age. I base the statements contained herein on my personal knowledge and would testify to the same under oath if asked to do so.
- 2. Attached hereto as Exhibit 1 is a true and correct copy of Docket No. 50, in the case of *Yadkin Riverkeeper, Inc. and Waterkeeper Alliance, Inc., v. Duke Energy Carolinas, LLC*, Case No. 1:14-cv-753, Middle District of North Carolina, entered October 20, 2015.
- Attached hereto as Exhibit 2 is a true and correct copy of a letter dated June 23,
 from me to Emily Vann, Assistant Attorney General, Environmental Enforcement
 Division, and the attachments thereto.
- 4. Attached hereto as Exhibit 3 is a true and correct copy of a letter dated October 8, 2015, from Emily Vann, Assistant Attorney General, Environmental Enforcement Division, to Maria V. Gillen, Senior Attorney, TVA's Office of General Counsel, and me, with attachments.
- 5. Attached hereto as Exhibit 4 is a true and correct copy of a "Report of Results" regarding "Examination of Sediment for Fly Ash and Bottom Ash," prepared for the Southern

Environmental Law Center by Steven P. Compton, Executive Director of MVA Scientific Consultants.

- 6. Attached hereto as Exhibit 5 is a map with the approximate location of the sediment sample that was the subject of the Report prepared by MVA Scientific Consultants, attached hereto as Exhibit 4.
- 7. Groundwater monitoring wells at the TVA Gallatin Plant were sampled in July and September of 2015. I am told by consultants who analyzed the samples and I believe that significant contamination by pollutants including Arsenic, Strontium, Zinc, Iron, Lead, Copper, Chromium, and Sulfate were found in the groundwater.

I declare under penalty of perjury that the foregoing is true and correct.

s/ Elizabeth A. Alexander ELIZABETH A. ALEXANDER October 23, 2015

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Declaration of ELIZABETH A. ALEXANDER and Exhibits 1-5 thereto were filed electronically on October 23, 2015 through the Court's Electronic Filing System. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

s/ Elizabeth A. Alexander ELIZABETH A. ALEXANDER